

LAMONICA HERBST & MANISCALCO, LLP

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October 18, 2019

By ECF & E-Mail

Honorable James L. Garrity, Jr.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408
Garrity.chambers@nysb.uscourts.gov

**Re: Penny Ann Bradley
Chapter 11
Case No. 18-10122 (JLG)**

Dear Judge Garrity:

This firm is special counsel to Penny Ann Bradley (the “Debtor”).

The following matters are currently scheduled for a hearing on November 6, 2019:

- (i) Case Status Conference;
- (ii) The Motion of NSM82 LLC to Appoint a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104(a) [Dkt. No. 131] (the “NSM Motion”);
- (iii) The Motion of Lewis H. Berman LLC (“Berman”) to Appoint a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104(a) [Dkt. No. 167] (the “Berman Motion”);
- (iv) The Debtor’s Objection to Proof of Claim Number 3 Filed by Atlas Union Corp. (“Atlas”) [Dkt. No. 172] (the “Atlas Claim Objection”);
- (v) The Debtor’s Objection to Proof of Claim Number 6 Filed by Russell and Lydia Pollack (the “Pollacks”) [Dkt. No 183] (the “Pollack Claim Objection”); and
- (vi) The United States Trustee’s (the “UST”) Motion to Convert This Case to a Case Under Chapter 7 [Dkt. No. 185] (the “UST Motion”).

The Parties previously consented to an adjournment to November 20, 2019. However, in light of the Court’s availability, the Parties have each consented to an adjournment of all scheduled matters to December 4, 2019, provided that the Court approves the adjournment and approves the following briefing schedule which is hereby being requested by the Debtor:

- (i) With respect to the NSM Motion, responsive pleadings have already been filed and the Parties request a deadline of November 27, 2019 for any supplemental pleadings;
- (ii) With respect to the Berman Motion, the Parties request deadlines of November 13, 2019 for the Debtor’s opposition, and November 18, 2019 for Berman’s reply;
- (iii) With respect to the Atlas Claim Objection, the Parties request deadlines of November 22, 2019 for Atlas’ opposition, and November 27, 2019 for the Debtor’s reply;

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- (iv) With respect to the Pollack Claim Objection, the Parties request deadlines of November 22, 2019 for Atlas' opposition, and November 27, 2019 for the Debtor's reply; and
- (v) With respect to the UST Motion, the Parties request deadlines of October 30, 2019 for the Debtor's opposition, and November 5, 2019 for the UST's reply.

Thank you for your consideration.

Respectfully submitted,

s/ Joseph S. Maniscalco
Joseph S. Maniscalco

cc: Nolan E. Shanahan, Esq; Jacob S. Frumkin, Esq.;
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Marion R. Harris, Esq.